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Attorneys for Plaintiffs and Counterclaim Defendants

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FOURTH AGE LIMITED, et al.,

Plaintiffs,

v.

WARNER BROS. DIGITAL
DISTRIBUTION, INC., et al.,

Defendants.

Case No. CV 12-09912 ABC (SHx)

Hon. Audrey B. Collins

**SUPPLEMENTAL
DECLARATION OF JULIA R.
HAYE IN SUPPORT OF REPLY
IN SUPPORT OF APPLICATION
FOR ISSUANCE OF LETTER OF
REQUEST FOR JUDICIAL
ASSISTANCE UNDER HAGUE
EVIDENCE CONVENTION**

[Reply in Support of Application for
Issuance of Letter of Request for
Judicial Assistance filed concurrently
herewith]

WARNER BROS. DIGITAL
DISTRIBUTION, INC., et al.,

Counterclaim Plaintiffs,

v.

FOURTH AGE LIMITED, et al.,

Counterclaim Defendants.

SUPPLEMENTAL DECLARATION OF JULIA R. HAYE

JULIA R. HAYE declares as follows:

1. I am an attorney duly licensed to practice in all of the courts of the State of California, and I am a partner of Greenberg Glusker Fields Claman & Machtinger LLP, attorneys of record for Fourth Age Limited, Priscilla Mary Anne Reuel Tolkien, as Trustee of the Tolkien Trust, the J.R.R. Tolkien Estate Limited, Harper Collins Publishers, Ltd., Unwin Hyman, Ltd. and George Allen & Unwin (Publishers), Ltd. (the “Tolkien/HC Parties”) herein. The facts set forth herein are of my own personal knowledge and if sworn I could and would testify competently thereto under oath.

2. The Tolkien/HC Parties have retained local counsel located in the Isle of Man to assist them in connection with their request for issuance of a Letter of Request for International Judicial Assistance Under Hague Evidence Convention (“Letter of Request”) to the Appropriate Judicial Authority of the Isle of Man for an order requiring production of documents from, and deposition of the custodian of records of, Microgaming Software Systems, Ltd. (“Microgaming Systems”). Specifically, the Tolkien/HC Parties have retained Charles Coleman, Director of Gough Law, who is an attorney located in the Isle of Man. Prior to submitting the Letter of Request to the Court, Mr. Coleman reviewed the Letter of Request, and each of the document requests attached thereto, to ensure that it complied with the laws of the Isle of Man.

3. On or about April 30, 2014, Defendants served their responses to plaintiff and counterclaim defendant Fourth Age Limited’s Fourth Set of Requests for Production (the “Document Requests”). The Document Requests sought many of the same Microgaming Systems-related documents now at issue in the Letter of Request. In response to the Document Requests, Defendants claimed that the vast

1 majority, if not all, of the documents sought were not within their possession,
2 custody or control.

3
4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

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7 Executed this 25th day of June, 2014 at Los Angeles, California.

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10 /s/ Julia R. Haye
11 JULIA R. HAYE

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